

## Allied Paper

## Meeting

Taken on: November 19, 2015

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4 ALLIED PAPER/PORTAGE CREEK/KALAMAZOO RIVER  
5 SUPERFUND SITE - PROPOSED CLEANUP PLAN  
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9 PRESENTATION AND PUBLIC COMMENTS

10 Held at the Washington Writers' Academy  
11 1919 Portage Street, Kalamazoo, Michigan  
12 Thursday, November 19, 2015, at 6:00 p.m.  
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19 Presenter: Michael Berkoff, U.S. EPA Remedial Project  
20 Manager

21 Coordinator: Diane Russell, U.S. EPA Community  
22 Involvement Coordinator  
23  
24

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(Public Hearing, November 19th, 2015, 6:00 p.m.)

MS. RUSSELL: All right. I want to be respectful of your time so we're going to get started. We do have a few other folks signing in but we have some housekeeping things. Before we get into the presentation, and especially before we kick off, I just wanted to say thank you for coming out tonight -- a lot of familiar faces, it's great to see many of you again. This is a place that we've been waiting to come to for a long time and so this is a milestone moment and we're glad that you could share that with us.

So tonight we are holding our proposed plan meeting; that's the purpose of tonight's meeting, and is for the Allied Paper Landfill, which is part of the Kalamazoo River Superfund Site. And I have some of these fact sheets -- many of you may have received these in the mail -- and they might be things to hold on to because of the many points as Michael goes through his presentation might be nice to have, not only the visual up here but also something you can reference in your hand. So that's what this is on and we also have an agenda I set out for many of

Page  
1 you. And I'm going over that in a moment but I  
2 thought this is going to basically break down how  
3 the evening is going to go.

4 I will say that on this agenda you'll  
5 notice that there's a break point. We are going  
6 to take a five-minute break before we make formal  
7 public comments and those comments are going to be  
8 recorded into record. We have with us a court  
9 reporter, who is going to be recording everything  
10 this evening. So please just be aware that we're  
11 recording this and that when you speak and ask  
12 questions and when we get to the verbal comments,  
13 if you could state and spell your name for the  
14 court reporter, and speak as clearly as you can so  
15 that we get that all on record.

16 Once we start the public comment portion,  
17 and I'll reiterate this again, just so we give  
18 everyone a chance to speak, if you could keep your  
19 comments brief and under five minutes -- I'll be  
20 kind of keeping track and give you a little nudge  
21 when it's getting near there.

22 And also -- you can always also turn in  
23 written comments and this written form is included  
24 in the fact sheet, but of course you could provide

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1 it on any paper you desire if you'd like to put it  
2 in word and send it to me. And we're taking those  
3 through December 1st. Postmark and send it to me  
4 in the mail postmarked by December 1st.

5 Okay, so before we get going and, again,  
6 for the purposes of the court reporter, if you  
7 could please take this opportunity to silence your  
8 cell phones and pagers, if any of you have  
9 pagers. All right. So for the agenda, we're just  
10 going to do a brief welcome and introductions and  
11 we've kind of covered part of this already, and  
12 then we're going to get into the presentation.  
13 Again, a lot of familiar faces here. You've  
14 probably seen a lot of these slides before, but  
15 maybe there are some new ones in there to keep  
16 things exciting.

17 And then we'll have a question-and-answer  
18 portion of the meeting and that will be a chance  
19 for us -- if you have questions about the proposed  
20 plan, for us to answer. And that's the best time  
21 to really get your questions answered because  
22 during the public comment portion we will not be  
23 responding to any questions at that time. So  
24 perfect time to get the back and forth in before

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1 we take the break and then do the public comments.  
2 If you want to make a public comment  
3 tonight, I encourage you, if you haven't already,  
4 pick up one of these numbered cards; it's really  
5 just a manner for me to make sure on the  
6 transcript we get your name right, as well as keep  
7 an orderly fashion. Once we take a break, I'm  
8 going to set up a microphone in the middle aisle  
9 here and when I call your name you can just come  
10 up to the mic and provide your verbal comment for  
11 the court reporter. To stay on track with  
12 tonight's agenda, I'm going to go ahead and do  
13 introductions.

14 First, I'll introduce myself. I'm Diane  
15 Russell, I'm EPA's Community Involvement  
16 Coordinator for this site. I work out of the  
17 EPA's Saginaw office. And then we also have  
18 Michael Berkoff, who is EPA's Project Manager for  
19 Allied Landfill and we also have Jim Saric here  
20 who is also the EPA Project Manager for the  
21 Superfund site. We have Paul Bucholz, who is with  
22 Michigan Department of Environmental Quality and  
23 we have a few smatterings of other EPA and MDEQ  
24 folks, but these are the important people of the

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1 evening.

2 With that -- so part of the process when  
3 we get into cleanup for the EPA, is we have a  
4 public comment process and this is really what  
5 tonight is all about. We're in a place where  
6 we've come out with some -- we've looked at all  
7 alternatives and options of what we can do with  
8 the Allied Landfill Site and we took a look at  
9 each one of those, and EPA proposed a cleanup  
10 plan.

11 We didn't pick it; we can't do that,  
12 because we have to have the public's input, the  
13 community's input. And that's really what this is  
14 all about and the public comment period that we  
15 have -- we have to do a 60-day public comment that  
16 ends on December 1.

17 So tonight is an important step in this  
18 process with this public meeting and once we get  
19 through the public comment process there are other  
20 steps we go through as well, which I'll highlight  
21 towards the end here of the meeting tonight on how  
22 we review that and what that comes out to be. And  
23 then when we get to the point where we actually  
24 make a decision and say what definitively we're

Page  
1 going to go with. So with that process, I'm going  
2 to turn it over to Michael and he's going to go  
3 through the details of the proposed plan and to  
4 share with you. Michael.

5 MR. BERKOFF: Thank you, Diane. Thank  
6 you also for pointing that out to me. Thank you.  
7 Thank you also for coming here tonight and for all  
8 of the other nights you've joined us in our other  
9 events along the way here. I appreciate your  
10 participation throughout this process and I just  
11 want to thank you.

12 So this is the proposed plan for the  
13 Allied Landfill. What you're seeing in front of  
14 you now is the entire Kalamazoo River Superfund  
15 Site, which includes the river, a couple of paper  
16 mills and four landfills. You can see Allied  
17 there in the orange; it's the fourth of the four  
18 landfills.

19 The other three ones: 12th Street  
20 Landfill, King Highway Landfill, and Willow Blvd.  
21 A-Site Landfill all have remedies in place.  
22 Here's a map of Allied Landfill showing us some of  
23 the squares on it. I want to point out towards  
24 your right-hand side there is where the main body



Page

1 of the landfill is, where the waste resides.

2 We talk about the Bryant Historic

3 Residual Watering Lagoons -- the former residual

4 watering lagoons -- and the Monarch Historic

5 Residual Watering Lagoons and that was across

6 Portage Creek. Nestled in the middle of this

7 property is the Panelyte Property, which is not a

8 part of the site, just south of Alcott Street.

9 This way's north.

10 So here's another view of the Allied

11 Landfill. What's different in this figure that

12 I'm showing you in gray, is the extent of

13 residuals; that's the paper waste which is

14 contaminated with PCBs. This was investigated

15 under remedial investigation and MDEQ led this

16 study and delineated the extent of it. You can

17 see it here.

18 The reason why I'm pointing out the

19 residuals here is because the PCBs are bound to

20 residuals and that's based upon the data we've

21 seen in remedial investigation, which we'll talk a

22 little about. Before we got to this date, before

23 we even did our remedial investigation, there was

24 some work done at Allied Landfill, some of the

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1 preliminary cleanup work, early cleanup work  
2 there.

3 There was a time-critical removal action  
4 at Bryant Mill Pond. So this area in kind of a  
5 tan-yellow right here is where there was waste  
6 historically and that was removed during the  
7 Bryant Mill Pond removal action where 146,000  
8 cubic yards was taken out of the Portage Creek and  
9 put into the main body of the landfill over here.

10 That excavation was done in the dry and  
11 we were able to get down to less than one part per  
12 million, almost the entire area. The peer piece  
13 that was from Millennium Holdings -- there are  
14 some comparisons gone, went bankrupt. We followed  
15 that time-critical removal action with some  
16 interim remedial measures that included putting in  
17 a sheetpile wall around the main body of the  
18 landfill that stopped it from getting back into  
19 the Portage Creek. It also included putting caps  
20 over some of the area and installing a groundwater  
21 collection system. The purpose of the system was  
22 to stop groundwater from mounding behind the  
23 sheetpile wall.

24 So after these activities, there were

1 some remedial investigations that looked at why is  
2 a cleanup necessary and that was in a document  
3 authored by The Michigan Department of  
4 Environmental Equality. EPA approved it in 2008,  
5 and it looked at a number of things; it developed  
6 a conceptual site model. One of the major points  
7 was that the PCBs are bound to the residuals. We  
8 expect that based upon what we know of PCBs, they  
9 want to bind to organic material and they  
10 certainly have a lot of it there at the site in  
11 the form of paper residuals. And that's backed up  
12 also by our investigation, too.

13 And we look at our soil data with a look  
14 at the PCBs. Even with paper residuals, we don't  
15 see it in the soil right next to residuals.  
16 Additionally, we also look at the groundwater  
17 data. We see that the PCBs are not detected in  
18 groundwater when we're looking outside the waste.

19 One of the other points made in the  
20 conceptual site model is as far as groundwater.  
21 The reason why groundwater has gotten a lot of  
22 attention at this site is that groundwater is  
23 influenced by Portage Creek, flows towards Portage  
24 Creek. And most importantly here is that it's not

1 flowing towards the city well field, dropping down  
2 and flowing towards the city well field.

3 So based on this, it may not pose a risk  
4 to the groundwater or city well field, groundwater  
5 may not be impacted, but there are still risks out  
6 there that need to be addressed and cleanup is  
7 still necessary.

8 So the risks that were identified in the  
9 remedial investigation are that consumption of  
10 fish that have been impacted by PCBs, by the  
11 residuals getting into Portage Creek pose a risk.  
12 That certainly was the case before the Bryant Mill  
13 Pond removal action and were things to get back  
14 into Bryant -- into Portage through erosion  
15 runoff, it would pose a risk again.

16 So jumping down to the third one, erosion  
17 and runoff of contaminated soil residuals could  
18 pose a risk again. Some of the residuals are  
19 exposed where they currently are and so they pose  
20 a risk of direct contact. So some of the concepts  
21 of our conceptual site model are kind of visually  
22 displayed to you. This is looking at the  
23 groundwater that is captured by Portage Creek and  
24 flows in that direction. You see that groundwater

1 kind of flows laterally towards Portage Creek here  
2 and as it approached Portage Creek it comes from  
3 further down closer to the surface towards Portage  
4 Creek.

5 So the key is upward gradient and not  
6 downward towards the city well field. Some of the  
7 exposures that we see then at the landfill itself,  
8 the risk would be erosion and runoff of  
9 contaminated material in areas that are not capped  
10 and this will pose a risk for erosion runoff.

11 When it does so, it could impact the fish and then  
12 consumers of fish. Further, uncapped residuals,  
13 exposed residuals could pose a risk of direct  
14 contact with people on the landfill.

15 So looking at the PCBs here and looking  
16 at the exposures here, we could look at a variety  
17 of medium, that means soil, sediments,  
18 groundwater. We looked at different kinds of  
19 exposure scenarios, exposure to people, exposure  
20 to animals and came up with a number of cleanup  
21 alternatives -- or cleanup numbers, sorry -- soil  
22 numbers, sediment, groundwater.

23 We also acknowledge that we know that  
24 where we have the residuals, we have the PCBs.

1     PCBs are bound to these residuals so we use a  
2     visual criteria for making our first crack at  
3     excavation. If you can see the residuals, you can  
4     use a visual indicator, excavate it, and see  
5     whether or not we got it all that way.

6             For the other contaminants at the site  
7     that are not PCBs, what we're using as our cleanup  
8     numbers are the generic Michigan numbers. After  
9     approving of the Michigan's remedial investigation,  
10    EPA ran a number of reports. In 2013, the  
11    feasibility study for the site, the feasibility  
12    study builds on the remedial investigation and  
13    takes some of those risks I just talked about and  
14    turns them into remedial action objectives. Those  
15    are the objectives that every alternative has to  
16    meet to be considered as one of the alternatives or  
17    the goal of the cleanup for that.

18            As a part of -- after developing these  
19    remedial action objections, EPA also does an  
20    evaluation of technologies looking at the different  
21    ones to be applied to meet those remedial action  
22    objectives. After we released the feasibility  
23    study in 2013, the city asked us to take a pause  
24    and to talk to them and talk to MDEQ and see if

1     there might be any other alternatives that we could  
2     see about that might also address the contamination  
3     at the site, meet the remedial action objectives,  
4     and possibly be better than some of the ones we had  
5     already concluded.

6                 So we did so. We started meeting with  
7     the State of Michigan, with the City of Kalamazoo,  
8     and talked to them about a couple of different ways  
9     to look at this property and take a look at EPA's  
10    cleanup process for this, too. Also, during this  
11    time, the Michigan, State of Michigan asked us to  
12    take another look at the groundwater data and we  
13    did so. And then lastly, too, the City of  
14    Kalamazoo also asked us to take another look at  
15    different alternative remediation technologies and  
16    see whether or not any of them would be applicable  
17    here.

18                EPA called on its national experts who  
19    took a look at all the different emergent  
20    technologies and to evaluate whether any would be  
21    applicable here are at the Allied Site. Our  
22    conclusion was that they're not. Due to the nature  
23    of the waste site here, the PCBs are bound to the  
24    waste and that although there are some intriguing

1 technologies for maybe other sites, they don't seem  
2 to be applicable here at Allied Landfill.

3 So in 2015, one of the things that we  
4 were working on with the city while looking at  
5 other alternatives, we put together an addendum to  
6 the feasibility study and published it June of  
7 2015. And that included this new alternative,  
8 which includes that much larger pullback of the  
9 waste and it brings in long-term storage. From the  
10 groundwater study, the purpose of it, of the  
11 groundwater study, was to support potential  
12 development and long-term groundwater monitoring  
13 network of the site. As part of it, we installed  
14 additional deep wells, looking at some of the  
15 groundwater, investigated and ultimately confirmed  
16 the conceptual site model from the State of  
17 Michigan's remedial investigation.

18 So I mentioned a few moments ago the  
19 remedial action objectives. So we're putting  
20 together the alternatives as these three  
21 objectives: to prevent direct contact, and that's  
22 the first action objection; and the second one is  
23 to prevent PCB contaminated materials from eroding  
24 and getting into Portage Creek; and lastly, to



1 prevent contaminated waste material from impacting  
2 ground and surface water.

3           So we have these remedial action  
4 objectives. We evaluate the technologies and come  
5 up with an array of alternatives. Those  
6 alternatives in order to be included in the  
7 feasibility study have to meet professional  
8 criteria of being protective and meeting EPA laws.  
9 So that's how we get to our cut of what are the  
10 alternatives that we have.

11           Once we start comparing these  
12 alternatives against each other, we look at some of  
13 the balancing criteria -- we look at the balancing  
14 criteria of the long-term effectiveness and  
15 permanency of the remedy; whether or not it  
16 produces toxicity through treatment; short-term  
17 effectiveness; impenetrability; and  
18 cost-effectiveness, and that comes from looking at  
19 the cost and comparing it to the long-term  
20 effectiveness, short-term impact, and the value  
21 impact there. So the modifying criteria are state  
22 and community acceptance.

23           So including the addendum, the full array  
24 of alternatives, EPA evaluated for the no-action

1 alternative, which is required in our analysis and  
2 then an array of consolidation capping  
3 alternatives. The first is 2A, which would leave  
4 that Monarch hurdle where it is. Second one is 2B,  
5 which would take Monarch over as its main body of  
6 landfill. Then 2C, which is much like 2B, except  
7 of the waste that's excavated. The most highly  
8 contaminated would be sent off site for  
9 incineration. I should say, too, in these three  
10 consolidation capping alternatives, that the  
11 alternatives would include a fence around the  
12 landfill.

13 In 2D, it's much like 2B, except for the  
14 footprint would be much more consolidated. And  
15 there would be long-term stewardship involved in  
16 the remedy that would come in two ways; it would be  
17 active-use of the capped area with some light  
18 recreation, which would bring stewardship there.  
19 And, also, the areas around the base of the  
20 landfill that would be subject to excavation would  
21 be then available for some kind of reuse with more  
22 commercial/industrial uses, which would have an  
23 effect on long-term stewardship there, too.

24 The other alternatives are, No. 3,

1 removal and off-site disposal. After that removal  
2 would be done, the main body of landfill would be  
3 wetland. And then the last one is encapsulation  
4 and long-term monitoring network; that would be  
5 building containment cells on the property,  
6 excavating material, putting down liner and putting  
7 a backing and containment cells.

8 Here are the costs, the estimated costs  
9 of the remedies, the capital costs and how much it  
10 would cost to build it, and then what we estimated  
11 for the OEM costs. A lot of people have had  
12 questions about an OEM costs, so this number here,  
13 what it represents is if you take this money now,  
14 put it in a bank account and have it earn interest,  
15 that money in that bank account would be allocated  
16 for paying for the estimated long-term --- or pay  
17 for the upkeep long term. And so this then gives  
18 us our total number over here.

19 Some of you may be familiar with this  
20 graphic from our fact sheet. It's a comparison of  
21 the different alternatives against each other and  
22 some of these are things we looked at in our  
23 evaluation of the alternatives using the criteria.  
24 I should note that we talked about the area

1 available for reuse; that's not one of the criteria  
2 here, but certainly the long-term stewardship that  
3 would occur at these areas is something that  
4 factors into the long-term effectiveness in front  
5 of us.

6 We'll give you an opportunity to look at  
7 this for a few little bit. You can see the  
8 short-term impacts of truckloads going to the site  
9 and leaving the site. Some of it bringing backfill  
10 in green; leaving the site in orange. How much PCB  
11 material would be managed?

12 So ultimately when the EPA was looking at  
13 these criteria, and is proposing alternative 2D, is  
14 because the long-term effectiveness and permanence  
15 of that remedy is heightened and we feel that is  
16 enough to outweigh the other alternatives.

17 So here's the proposed alternative; it's  
18 consolidation capping of material with long-term  
19 stewardship of the property. It would be done by  
20 having a greatly reduced footprint, allowing for  
21 reuse around the area or reuse on top and gaining  
22 the stewardship that way. One of the remedial  
23 action objections, as I said, was prevent waste  
24 from getting into Portage Creek.

1           Also, by having this footprint reduced  
2     and pulling waste away from Portage Creek, really  
3     helps address that remedial action effectively. An  
4     implementation for this remedy would be about three  
5     years once we start the cleanup. Another way to  
6     look at the remedy here is just another view of it  
7     and it gives you an idea of what the work would  
8     entail. The areas in brown would be subject to  
9     excavation and this purple would be where the cap  
10    would be.

11           Now, the footprint we're showing here  
12    does not look exactly like what the city had shown  
13    in their presentation in February of this year, but  
14    that doesn't mean that we can't get there  
15    eventually. What it speaks to and I think what the  
16    take-home message is there, is really that more  
17    collaboration is necessary in the future. The city  
18    has shown that maybe some of the waste can be put  
19    at Panelyte. Given Panelyte, and EPA doesn't have  
20    control over it -- but that might be possible  
21    through further collaboration. I'm going to hand  
22    it back to Diane.

23           MS. RUSSELL: Thank you, Michael. All  
24    right, so let's go back to this graphic from the

1 beginning, and basically I just want to highlight  
2 the next steps here. And once we complete the  
3 60-day public comment period, which we're in now,  
4 and not only tonight providing your verbal  
5 comments, but you could also provide that via mail.

6 We also have a public comment form online  
7 and all that information on where to access is in  
8 this gray box on the fact sheet right towards the  
9 bottom, public comment period, several ways to  
10 offer comments. So if you don't feel like getting  
11 out in the public tonight and voicing your concern,  
12 you can certainly do that in writing or online in  
13 the public comment form.

14 So once we complete that 60-day public  
15 comment period, EPA considers those comments and  
16 records the responsiveness -- their responses in  
17 the document that they called the responsiveness  
18 summary. So that's where EPA consolidates the  
19 comments they've gotten and responds to each one of  
20 those comments in a way that addresses what those  
21 were about. And then that responsiveness summary  
22 will be included for public record and viewing  
23 along with the record of decision which is expected  
24 Winter/Spring of 2016.

1           So there's still a few steps to go even  
2   after tonight. We've got the public comment  
3   period, which is complete December 1 and then we go  
4   to the next step of actually taking time to review  
5   all of those comments and coming up with responses  
6   to those, and then getting onto the record of  
7   decision.

8           All right. So now we come to the portion  
9   of the meeting where we are -- we'll take  
10   questions. I just want to reiterate that this is  
11   time to ask and interact. If you have -- and I know  
12   that many of you have asked Michael questions  
13   before, it's time to do that if you want to take  
14   advantage of that now before we take our break,  
15   because, again, we cannot respond during the public  
16   comment portion. We will listen but we can't  
17   respond to questions.

18           So now is the time -- and what we'll do  
19   to make this so we can make sure that everyone's  
20   questions are picked up by the court reporter, I'll  
21   come around to you with a microphone and please  
22   before you make your question, if you could state  
23   your name for the court reporter that would be ever  
24   so helpful. So with that, would anyone want to

1 start off with the questions portion of the  
2 meeting? Raise your hand. All right. I'll come  
3 over to you. Don't forget to state your name for  
4 the court reporter, please.

5 MR. WHITESIDES: Romeo, Oscar, Bravo --

6 THE COURT REPORTER: Just spell it,  
7 please? Could you just spell it. I'm sorry.

8 MR. WHITESIDES: W-h-i-t-e-s-i-d-e-s. My  
9 goal is to clean up, you say there are safe levels  
10 of contamination that you must meet?

11 MR. BERKOFF: Yes.

12 MR. WHITESIDES: Unlisted and undisclosed  
13 contaminants, at least in your presentation. I  
14 know in the documentation there are long lists of  
15 contaminants in addition to PCBs.

16 MR. BERKOFF: Yes.

17 SPEAKER: How does that fit with the  
18 strictest interpretation that this site is  
19 contaminated with PCBs and the rest of it is never  
20 mentioned as part of the Superfund process, but yet  
21 we're going to clean it up. Is that only as  
22 incidental to PCB or is it specifically targeted?

23 MR. BERKOFF: I would say that those  
24 other constituents are specifically targeted; that



1 we would have always discussed them in remedial  
2 investigation, feasibility study providing cleanup  
3 numbers for all of them. During any kind of  
4 cleanup going on out there and confirmation there,  
5 would be confirmation for those constituents, too.  
6 Certainly they identify PCBs as the primary  
7 constituents concerned, but we also characterize  
8 the other constituents. We also have examples of  
9 lead; we have chromium out there; mercury. We've  
10 looked at all of those, we've tested those to see  
11 if we have hazardous levels and we don't. So we  
12 have investigated those in some of our other  
13 documents.

14 MS. RUSSELL: I have this working again.  
15 Sorry. Anyone else want to ask a question? I'm  
16 going back here. State your name for the court  
17 reporter, please.

18 MR. KORNHEISER: Ken K-o-r-n-h-e-i-s-e-r.  
19 At the October 22 meeting there was a firm that  
20 came forth called BioPath, they said they had some  
21 kind of bio remediation. That was four weeks ago,  
22 so this is a two-part question. One is, has there  
23 been any change in EPA's assessment or interactions  
24 with this company regarding the bio-remediation

1 process? And the second question would be, if that  
2 is not considered, if it's not included in the  
3 recommendation, the decision, is there still an  
4 opportunity for that process to be introduced?

5 MR. BERKOFF: Thank you. So the question  
6 is a -- Mick Warner is actually here tonight -- and  
7 talked about BioPath, technology that his company  
8 has and whether or not it would be a viable  
9 technology at the landfill. I haven't heard  
10 anything from Mick since then in that meeting and  
11 the night before I had offered him the opportunity  
12 to do a bench-scale study using waste from Allied  
13 and haven't heard anything.

14 I have gone out and gotten a little bit  
15 more information about BioPath, went onto their  
16 website and haven't found anything that really  
17 discusses their success stories, no studies that  
18 show whether or not it's viable. That said, I'd be  
19 happy to work with BioPath and see whether or not  
20 the technology is viable for waste and Allied and  
21 they're more than welcome to approach me, and as  
22 far as moving forward, I think the first step is  
23 really to figure out if it's a viable technology.

24 MR. KORNHEISER: So is that process still

1 available for utilization if there's a route that  
2 does not include it specifically?

3 MR. BERKOFF: You know, the circle  
4 process allows us to amend remedies if it's  
5 necessary. And certainly if there's a silver  
6 bullet out here that can address PCB contamination,  
7 we would want to utilize it if it's a viable  
8 alternative, but I think the first step really is  
9 to do a bench-scale study. And like I said, I'm  
10 very happy to facilitate that, calling on some of  
11 EPA's experts to make sure is a defensible study so  
12 that we can evaluate it appropriately.

13 MS. RUSSELL: We have a question here.

14 MR. FENSTERMAKER: Hagan Fenstermaker,  
15 H-a-g-a-n F-e-n-s-t-e-r-m-a-k-e-r. Could you  
16 discuss a little bit the difference in options 2C  
17 and 2D. Is the primary difference not shrinking  
18 the footprint of the primary landfill area outside  
19 of the removal incineration?

20 MR. BERKOFF: Well, The removal  
21 incineration is the considerable difference; it  
22 drives up the cost for alternative 2C because the  
23 facilities that can handle incineration, I think  
24 we've got one in Texas or Utah. So that would be

1 -- that would really drive up the price compared to  
2 2D. But as far as differences between 2C and 2D,  
3 is that incineration component, the landfill is  
4 shrunk considerably in 2D. The fences would still  
5 be up in 2C. The fences would be down except for a  
6 small portion for a mechanicals and landfill gas  
7 collection system in 2D, that is. And then --  
8 those would be the primary differences.

9 MR. FENSTERMAKER: So that would be  
10 offsetting the cost of incineration at the  
11 remaining landfill --

12 MR. BERKOFF: Well, -- I'm sorry?

13 MR. FENSTERMAKER: -- significant  
14 differences reclaimed in 2D, but in 'C' you're  
15 actually proposing removing material so I'm just  
16 trying to figure out the difference --

17 MR. BERKOFF: Yes. The material would  
18 not be that large of an amount; it would be more  
19 like 10,000 cubic yards. And it's really the cost  
20 there, is purely for that transportation and then  
21 incineration. So I kind of look at it as more  
22 separate things; they are both building off of 2B,  
23 so when you go from 2B to 2C, you'll -- 43 million  
24 to 70 million and then when you go from 2B to 'D',

1 you'll go from 43 million to 63 million.

2 MR. FENSTERMAKER: This flat square  
3 footage in 'C' is larger, I guess you'll have a  
4 higher height in 'D'; is that a fair statement?

5 MR. BERKOFF: We have a higher -- 'D', we  
6 have a higher pullback from the creek, which is a  
7 real positive there and then the stewardship that  
8 would come with reuse of the property adding to the  
9 long-term effectiveness for 2D.

10 MS. RUSSELL: All right. We have a  
11 question up here.

12 SPEAKER: George Magas, M-a-g-a-s. You  
13 said that you had to go to Texas to take the PCBs  
14 to incinerate. We have a major concentration of  
15 paper plants in Michigan, so why can't we get ahold  
16 of the company that builds those, build one of them  
17 here, give them a million dollar grant money to  
18 build a facility and we can burn all the PCBs  
19 throughout the and that will resolve the problem.  
20 I mean, I don't understand this. You guys, you  
21 want nuclear waste from out East and down in  
22 Florida all the way to Nevada; that's never going  
23 to happen. I mean it costs too much money to ship  
24 it from one part of the country to the other when

1 we spent millions of dollars on these facilities  
2 that we're never going to use. I mean, the EPA is  
3 crazy.

4 MR. BERKOFF: Okay, thank you.

5 MS. RUSSELL: Question? I want to get  
6 everyone's comments and I want to take a couple  
7 more questions; we're open to do that. Otherwise  
8 we'll take a five-minute break. Any questions you  
9 wanted to get in at this point? Going once, twice.  
10 All right. Can we just take a brief five-minute  
11 break and we'll come back and we'll start the  
12 public comment portion. If you want to make a  
13 public comment, please grab a card and turn it in  
14 to me and they'll be at the registration desk and  
15 they look like this. And then go ahead and turn  
16 those in to me if you would.

17 (The hearing is recessed at 7:00 p.m.)

18 (The hearing is resumed at 7:05 p.m.)

19 MS. RUSSELL: Okay, we're going to get  
20 started with the public comment portion of the  
21 meeting. First, a few of the instructions. Please  
22 remember that this is your opportunity to provide  
23 comments, which will be recorded as part of the  
24 official record for this project. EPA will not be

1 responding to comments or questions expressed  
2 during this portion of the meeting but the EPA will  
3 follow up with a responsiveness summary, with the  
4 meeting being made available to the public.

5 If you turned in a card, I will call your  
6 name and come to the microphone at the front and  
7 state your comment. You don't have to worry about  
8 your name, I'm going to hand your names over to the  
9 court reporter so you don't have to worry about  
10 that.

11 But do speak clearly so she can record  
12 that and note that only spoken words and not  
13 gestures will be recorded. And so that everybody  
14 will have a chance to speak please keep your  
15 comments brief. I'm going to kind of keep track  
16 and at the five-minute mark I will kind of -- you  
17 to allow some others to come forward. After this  
18 hearing, this meeting we'll be receiving a  
19 transcript of the meeting, the PowerPoint  
20 presentation, all the comments that you received  
21 tonight from our court reporter and we'll post  
22 those on our website.

23 With that, I will get started with our  
24 first commenter and I'll ask you just to step

1 forward to this microphone in the front aisle here.

2 And our first commenter is Claus Globig.

3 MR. GLOBIG: My name is Claus Globig,  
4 C-l-a-u-s G-l-o-b-i-g, and I'm an international  
5 consultant and I've lived in Kalamazoo for 54  
6 years. I'm a chemical and mechanical engineer and  
7 I have followed the PCB issue in the role of  
8 investigative reporter for the last 20 years. As a  
9 result, I can say today that the fence around the  
10 landfill could be removed tomorrow and the area  
11 developed without any harm to human or plant life  
12 as far as PCBs are concerned.

13 The rationale for this conclusion is  
14 contained in a 35-page lecture, which I gave to  
15 Western Michigan University's engineering students,  
16 and also in an abbreviated open letter to the  
17 residents of Kalamazoo. In a nutshell, the history  
18 is as follows: A young medical director -- a  
19 medical doctor and pathologist, Renate Kimbrough,  
20 came from Germany and devoted her professional life  
21 to public health by working for the U.S. EPA and  
22 for the U.S. Department of Health, Education, and  
23 Welfare and later, again, for the U.S. EPA. In two  
24 studies from 1972 and 1975, she and her coworkers



1 fed laboratory rats very large amounts of PCBs and  
2 the rats got liver cancer, but no other cancer.

3 The EPA classified PCBs as probable human  
4 carcinogens with all of its extensive consequences  
5 mostly based on the 2nd study from 1975. Then a  
6 researcher in Germany, Dr. Ekkehard, repeated  
7 Dr. Kimbrough's work in 1984. They found that the  
8 treated rats got more liver tumors, but fewer  
9 tumors of other tissues, so that their overall  
10 cancer rate was lower and their survival rate  
11 better than for the untreated rats.

12 There was a protective effect for cancers  
13 other than liver cancers. Later, Dr. Kimbrough  
14 became the director for Health and Risk  
15 Capabilities in the Office of the Administrator of  
16 the U.S. EPA in Washington, DC. She left the EPA  
17 in 1889 [sic] after only two years in this  
18 position.

19 When I asked her why she resigned from  
20 this important and secure position, the answer was  
21 very short; it became political. When the chairman  
22 of General Electric asked her to evaluate the  
23 health of workers heavily exposed to PCBs in their  
24 work, she agreed and followed, with her coworkers,

1 the health of more than 7,000 workers for 34 years.

2 The book was published in 1999 and later  
3 confirmed in 2003 with an update which concluded  
4 that PCBs do not cause cancer or any other serious  
5 illness in humans. In 2009, Dr. Robert Golden and  
6 Dr. Renate Kimbrough stated in a paper: The weight  
7 of evidence does not support a causal association  
8 to PCBs and human health, cancer. The dramatic  
9 differences between rodents and humans in  
10 sensitivity to PCB-mediated induction of CYP1A1  
11 gene, suggests that even occupational exposure to  
12 PCBs have never resulted in PCB body burdens  
13 approaching the levels required to initiate the  
14 sequence of events involved in the promotion of  
15 liver cancer in rodents.

16 These comments explain why I have a  
17 problem with the U.S. EPA headquarters in  
18 Washington, DC. To prove a cause-and-effect  
19 relationship, one would have to demonstrate a  
20 pathway. Thank you.

21 MS. RUSSELL: Thank you. We have Robert  
22 Whitesides.

23 MR. WHITESIDES: My name is Robert  
24 Whitesides and it's still spelled the same. There

1 seems to be a conflation of the cost and funding.  
2 Cost is one of the balancing items of the nine  
3 goods, I believe. I'd say that because whenever I  
4 see the nine factors I think the little red book of  
5 something.

6 Funding is totally separate; it's not  
7 addressed by EPA in any of these decisions. What  
8 we do know is that there is funding established  
9 through the Chapter 11 process that Lyondell Basell  
10 went through. And I'd like everybody to become  
11 familiar with the document and I'll read it, but  
12 I've given the copies to the court reporter:

13 The United States' Memorandum in Support  
14 of Debtors Motion Pursuant to Fed R. BANKR.P.9109  
15 to Approve Settlement Agreement Among the Debtors,  
16 The Environmental Custodial Trustee -- or trust  
17 trustee, The United States, and Certain State  
18 Environmental Agencies.

19 This is what was hashed out over about  
20 six months between all of those characters,  
21 submitted to the court and the court approved it.  
22 It has a special reference on page 12, Section 7  
23 called the Kalamazoo Site and I will read it for  
24 clarity:

1           Because most of the comments received by  
2     the United States pertain to the Kalamazoo site --  
3     most of us participated in those comments -- key  
4     items of the proposed settlement agreement  
5     applicable to that site are summarized separately  
6     here. Under the proposed settlement agreement, the  
7     Kalamazoo Site is addressed pursuant to the terms  
8     described above in connection with liquidated  
9     sites, settlement of the debtor's objections to the  
10    United States' proof of claim, and the  
11    Environmental Custodial Trust. More specifically,  
12    the proposed settlement agreement provides for  
13    three distinct settlement amounts for the Kalamazoo  
14    Site.

15           First, EPA will receive an allowed  
16    general unsecured claim of \$908,261,837 against  
17    debtor Millennium Holdings, LLC for the Kalamazoo  
18    Site, and DOI -- The Department of the Interior --  
19    and NOAA will receive an allowed general unsecured  
20    claim against Millennium Holdings of \$124,231,125  
21    for the site. And they referred to 'See Settlement  
22    Agreement', Sec. 4(a)(2).

23           Second, EPA will receive a cash payment  
24    of \$49,549,379 for the Kalamazoo Site as part of

1 the settlement of litigation with the debtors  
2 concerning the dischargeability of injunctive  
3 environmental obligations and non-debtor owned  
4 property -- clarifying non-debtor owned property;  
5 that's the river, and they refer to Sec. 5(a)(2) of  
6 the agreement. Last, certain debtors will transfer  
7 \$53,721,850 in cash to the Environmental Custodial  
8 Trust to be used for the cleanup and restoration of  
9 the Allied Paper Mill property, a debtor-owned  
10 portion of the Kalamazoo Site known as Operable  
11 Unit One.

12 So what we have is specified in an  
13 agreement in bankruptcy court that there is 53  
14 million for the Allied Paper Mill property, a  
15 debtor-owned portion, and that is now under the  
16 control of the environmental trustee known as the  
17 LaPetamine 23, I believe, headquartered in Chicago.

18 The other money is for settlement of  
19 litigation for non-debtor owned property, which is  
20 the river itself. So I think this conflation of  
21 these two amounts into some \$100,000,000 has been  
22 dogging people for quite some time, but is  
23 specified in this agreement.

24 MS. RUSSELL: We have Jim Miller.

1 MR. MILLER: Good evening, my name is Jim  
2 Miller and I'm president and founder of Catskill  
3 Remedial Contracting Services, an Otsego-based  
4 environmental contractor. I've been working in the  
5 environmental remediation business since 1972,  
6 including nine years with the Michigan Department  
7 of Natural Resources.

8 During that time, I spent a good deal of  
9 my time there administrating -- administering  
10 enforcement actions to facilitate the proper  
11 closure capping in operation landfills, public and  
12 private, in Michigan. I founded Catskill in 1995  
13 and we have since that time worked on about 200  
14 landfill projects throughout the Midwest. A local  
15 one that you might be familiar with is the capping  
16 of the KL Avenue Superfund Site Landfill with a  
17 company that a Mick Warner, who is here tonight,  
18 was with also. We continue to maintain that site  
19 since that time, since we capped it.

20 With my background, I'm familiar with all  
21 components of closing a landfill; regulatory  
22 compliance; the design and implementation of  
23 capping and closure; and post closure and long term  
24 operations and maintenance. With regard to the

1 Allied Paper Landfill Site, I think it's preferable  
2 and important to fully clean-close the site so that  
3 the entire site can be reused, and I think it is  
4 important that we use local labor and resources to  
5 get us there. Because we are a local company, we  
6 support complete cleanup and not just the Allied  
7 Site but the entire river.

8           The plan that we are preparing to commit  
9 to, to achieve total cleanup of the Allied Paper  
10 Site, \$48,000,000 is \$15,000,000 less than the  
11 EPA's estimate of 63 million, which will leave 15  
12 million available for the cleanup of down river  
13 contamination.

14           The plan for the Allied Landfill Site is  
15 to use BioPath Solutions enzymatic dechlorination  
16 process to eliminate PCBs on-site. The cleanup is  
17 structured in this fashion in such that the cleanup  
18 team gets paid the full \$48,000,000 only if the  
19 full cleanup is achieved by enzymatic  
20 dechlorination. If a full cleanup is not achieved  
21 and any of the material has to be capped on site,  
22 15 million of the total \$48,000,000 we've  
23 restricted for long-term operation and maintenance.  
24 We believe this is a more appropriate amount and

1 shows a further commitment to cleaning up the site.

2 Because of Catskill's experience over the  
3 last 20 years, we believe that the site activities,  
4 including the BioPath's Solutions enzymatic  
5 dechlorination, in accordance with Option D in two  
6 to three years, we know that we can do this safely  
7 and in full compliance of the Superfund process,  
8 and most of our work is in Western Michigan and  
9 most of our employees live in and around Kalamazoo.  
10 We feel strongly about employing local labor so  
11 that the people performing the work share with your  
12 desires to complete the work timely and safely.

13 For the team to do this project, we will  
14 need the Allied Paper Landfill to become a private  
15 Superfund site so that the team can believe the  
16 approaches commonly used on Superfund sites,  
17 including KL Avenue or most of the other work on  
18 the Kalamazoo River. It tends to be substantially  
19 less expensive and in recognition of this  
20 efficiency, the EPA has recently voiced its support  
21 of public/private partnerships that move  
22 performance from federally to privately.

23 Again, our priority is to efficiently  
24 clean the site and bring it to a full reuse. We



1 are asking for support from the community and our  
2 request to the EPA and facility to transfer the  
3 Allied Paper Site privately and to support the use  
4 of alternate -- alternative technology including  
5 BioPath's enzymatic dechlorination. We have a  
6 template letter of support that we encourage you to  
7 modify to reflect your thoughts and words. My team  
8 lead, Ann Larums, is here tonight and she can  
9 assist in any way coordinating your effort before  
10 the deadline for public comment. Thank you very  
11 much.

12 MS. RUSSELL: Next we have Chris Young.

13 MR. YOUNG: I think you're going to have  
14 to move that up a bit. I think that's almost  
15 perfect. My name is Chris Young and I'm the chief  
16 technology consultant for BioPath Solutions. I'm  
17 also the original developer of the remedial  
18 biotechnology of the cleanup of the PCB impacted  
19 soil and Allied Paper Landfill Site here in  
20 Kalamazoo.

21 I'm a Michigan native. I was born and  
22 raised in Midland, I graduated from Central  
23 Michigan University. My training is in organic  
24 chemistry and I have more than 30 years of

1 experience in the development of insecticides,  
2 herbicides, rodenticides, fungicides. In other  
3 words, I'm something of an expert in toxic  
4 materials. In the late 90s I was involved in  
5 research and the development of human gene  
6 therapies for the treatment of HIV and cancer.  
7 During this research, we studied bacteria collected  
8 from hazardous waste sites looking for a link  
9 between chemical exposure and impaired human immune  
10 response.

11 We discovered that in the presence of  
12 these chemical pollutants, including PCBs, the  
13 natural soil bacteria cannot secrete a reductive  
14 enzyme necessary to break down PCBs into component  
15 organics that the soil bacteria can then use as  
16 food. This PCB-induced impairment is the reason  
17 why PCBs persist in the environment following  
18 release. The bacteria is prevented from producing  
19 reductive enzymes necessary to break down PCBs.

20  
21 Following years of research and testing,  
22 we developed an effective process that restores  
23 bacterial enzyme production even in the presence of  
24 the offending PCBs. The restored soil bacteria

1 rapidly dechlorinates the PCBs, then metabolized,  
2 the residual organic component material, the  
3 process is turned, enzymatic dechlorination through  
4 enhanced bioremediation. The process is  
5 restorative, it's safe, it's 100% effective, and  
6 its performance is 100% predictable.

7 I'm here today to address and lay to rest  
8 any concerns that this remedial process has  
9 proposed for the cleanup of the PCP impacted soil  
10 at Allied Paper Landfill, that it's too new, that  
11 it's unproven and therefore unreliable.

12 In 1998, the first-generation factor  
13 product was the very first biological treatment to  
14 achieve residential cleanup goals on a highly  
15 persistent insecticide called toxaphene. In 2005,  
16 a factor-based product achieved the first ever  
17 cleanup of the PCB site in California, achieving  
18 residential clean-up goals in a single season.

19 In 2014, the factor product demonstrated  
20 the remarkable capacity to reduce residual dioxins  
21 in soil by 61%, the dioxin reduction never before  
22 achieved through bioremediation. This on-site  
23 remedial biotechnology has been successfully  
24 utilized to clean up dozens of sites impacted by

1 the most toxic and persistent pollutants.

2 In each of the successful cleanups  
3 achieved to date, the sample of the sites' water  
4 was sent to us for analysis and bench study.  
5 Following chemical and pollutant analysis by an  
6 independent laboratory, one or more product  
7 formulations are modified for the sites' chemistry  
8 and its microbiology. The product candidate  
9 formulation is then tested at bench to determine  
10 which product formulation will achieve the greatest  
11 PCB reductions in the shortest period of time.

12 And this is the point I'd like to  
13 emphasize, that BioPath Solutions will not,  
14 absolutely not mobilize in the field unless we are  
15 confident that the analytical data confirms that  
16 the product formulation selected for the Allied  
17 Paper Landfill Site will achieve the cleanup  
18 standards. They're in the process of gathering  
19 samples down river and have submitted a request to  
20 EPA to help us secure samples from the Allied Paper  
21 Landfill.

22 We've also begun the process to share our  
23 proprietary information with EPA. The soil  
24 treatment would be performed on-site and no

1 contaminated soil would be trucked off-site. Soil  
2 amendments would be incorporated in the soil to  
3 enhance the natural bacterial activity and to  
4 optimize PCB destruction. Great care will be taken  
5 to minimize particulate production and any off-site  
6 movement of treatment soils.

7 BioPath Solutions' goal on every cleanup  
8 is to reduce or eliminate the site's target  
9 pollutant so the restored site can be reused and  
10 redeveloped without the restrictions for the  
11 benefit of the local community.

12 There is no logic in accepting a capped  
13 polluted site for the Kalamazoo community when  
14 common sense dictates that eliminating the site's  
15 pollutants is a far superior solution to simply  
16 burying and capping the site's pollutants. When  
17 the cost to eliminate the site's pollutants is less  
18 than capping and long-term monitoring, then the  
19 decision for all of the stakeholders should be the  
20 easiest decision to make. Thank you.

21 MS. RUSSELL: Thank you. Mick Warner is  
22 next.

23 MR. WARNER: Good evening. My name is  
24 Mick Warner and I'm the president of BioPath

1 Solutions. We're part of a local team that  
2 proposes to clean up the Allied Paper Landfill  
3 Site. You've heard from Jim Miller, the president  
4 and owner of Catskill, the local contractor; and  
5 from Chris Young, the co-developer of the  
6 technology. We're confident that our team can  
7 achieve total effective removal and that we can do  
8 this safely in comparable time as the EPA-proposed  
9 plan, using local labor with available funding and  
10 for less money.

11 Our approach is to transfer the  
12 responsibility for the cleanup to our team. We  
13 will use local labor to perform the work and then  
14 will have demonstrated the ability to biodegrade  
15 PCBs and pulp matrix before we mobilize the site.  
16 While we appreciate the desire to have the waste  
17 removed from the site, we need to accept that that  
18 will not happen. Our approach, which is  
19 total-effective removal rather than total removal,  
20 can happen.

21 Over the last five years we have spoken  
22 with many of you here and have put considerable  
23 effort into understanding the needs of all of the  
24 stakeholders. Our approach provides

1 total-effective removal with a contingency to  
2 consolidate and cap, making EPA's option 2D work  
3 all of the stakeholders. For the community  
4 members, there will be no 41-foot tower of waste  
5 and if there is any capping, there will be  
6 approximately three times more funding available to  
7 perform the long-term operation and maintenance.

8 Most importantly, we're ready and the  
9 funding is ready. There is no more waiting. To  
10 the city and to the county, the site will either be  
11 fully clean and ready for redevelopment or  
12 responsibly funded with safeguards to preclude  
13 Superfund liability. To the down river residents,  
14 you'll see a demonstration of a technology that  
15 will work on contamination down river and you'll  
16 have an extra \$15 million cleanup funds available.  
17 To the State of Michigan, this option can  
18 permanently eliminate a Michigan Superfund Site.

19 And to the EPA, you'll be the front and  
20 center in creating a replicable model of  
21 public/private partnership and advancing the  
22 technology that can be applied throughout the  
23 country. You'll have more funds available for down  
24 river and if necessary, more funds available for

1 operation and maintenance at Allied.

2           Tonight we're not asking the EPA or the  
3 public to formally select us as remedy provider,  
4 but rather to support our request. We asked that  
5 EPA facilitate the transfer of the Allied Paper  
6 Landfill Site to a responsible party lead and  
7 support the use of alternative technologies  
8 including BioPath's enzymatic dechlorination  
9 process. Cleanup, not cover up can happen but it's  
10 not going to happen on its own. We need the  
11 support of the community to influence EPA to  
12 support this proposed plan in conjunction with  
13 option 2D.

14           We have a template letter and my  
15 teammate, Ann Larums, is here and she's back in the  
16 back. She's available for any of you here to help  
17 with that request. The community has worked  
18 tirelessly to find a solution and to achieve total  
19 cleanup. I believe it's a testament to the power  
20 within this community to demand and require the  
21 highest level of care and support from its  
22 government officials. Together we can achieve  
23 total effective removal.

24           MS. RUSSELL: Thank you. I have Bill



1 Wells next.

2 MR. WELLS: My name is Bill Wells, of  
3 course. I've lived in the City of Kalamazoo all of  
4 my life. I have lived in this neighborhood most of  
5 that. I remember the landfill site when I was in  
6 junior high school with no fences and actually  
7 playing on the fields. Little bit of history is  
8 the City of Kalamazoo, by the time that it had  
9 grown to the 1920s, was just encroaching the  
10 northern edge of the contaminated site. The city  
11 has literally grown up around it and it has never  
12 been able to be used. We have an opportunity to  
13 really do something that's effective for everyone  
14 and I'm not just speaking about the residents or  
15 about the outward community, but also for all of  
16 the state and federal government and the process of  
17 seeing this taken care of in a responsible way. We  
18 as citizens have a responsibility to make sure that  
19 we have a safe environment to live in.

20 Now I raised five children in this  
21 neighborhood and am very proud of the fact that we  
22 have got the kind of city that we have, and that we  
23 need to take care of it. And so I appreciate all  
24 of the work that the EPA's done in collaborating

1 with the city and the residents. I think we need  
2 to continue that collaboration and do what's best  
3 for the residents in remediating this site. Thank  
4 you.

5 MS. RUSSELL: Thank you. Next is  
6 Jennifer Clark.

7 MS. CLARK: The EPA's proposed  
8 recommendation for Alternative 2D leaves behind a  
9 41-foot hill of PCBs in the heart of Kalamazoo.  
10 The contaminated sediments at Bryant Mill Pond were  
11 excavated as part of that emergency response action  
12 and temporarily relocated at the Allied Site. At  
13 the very least, I ask that the 146,000 cubic yards  
14 of temporary toxic waste be permanently removed and  
15 taken to a disposal site that is not in an urban  
16 area, is not situated on or near aquifers that more  
17 than 120,000 citizens rely on for drinking water,  
18 and is not adjacent to a recovering waterway.  
19 Thank you.

20 MS. RUSSELL: Gary Wager.

21 MR. WAGER: My name is Gary Wager and I'm  
22 Executive Director of the Kalamazoo River Cleanup  
23 Coalition. Our organization was formed in 2007 as  
24 a response to the EPA-approved plan to bring more

1 toxic waste to the Allied Site. After about two  
2 months or so of political activity and public  
3 demonstrations, in response to our activity I  
4 believe, the EPA changed their mind and went back  
5 to the responsible parties to secure the additional  
6 funds and disposed of the PCB-contaminated material  
7 that they were cleaning up and disposed of it  
8 properly in approved landfills.

9           Since 2007 -- 2008, we're officially  
10 recognized as a tax-exempt organization, 501(c)(3),  
11 by the IRS and since that time I'd like to say  
12 we've elbowed our way to the negotiating table and  
13 I think tonight is an important step in the process  
14 of getting something done at the Allied Site. Our  
15 board has approved in general terms an agreement  
16 with the 2D option. Certainly we're excited about  
17 the opportunities that are posed by the technology  
18 we've become aware of through BioPath and our  
19 letter with comments about the specifics of our  
20 request, one of which Jennifer just mentioned about  
21 the reducing the height of the remaining pile, will  
22 be submitted to the EPA in written comment.

23           In closing, I would just like to say  
24 thank you for all those of you and to the EPA who

1 have worked over the years. Also, I see a  
2 representative from Lansing, from the MDEQ, and  
3 Paul, and all of you who are paying attention to  
4 this important issue and I think that the activity  
5 that our organization and the citizens of Kalamazoo  
6 and particularly some of our partners such as the  
7 City of Kalamazoo, have improved the compromise  
8 that we see now compared to what we would have  
9 received had we done nothing back in 2007. Thank  
10 you.

11 MS. RUSSELL: Gillian Asque.

12 MS. ASQUE: I am Gillian Asque. I'm a  
13 former Bronco and I've just got four concerns I'd  
14 like to address. My first one is with the  
15 cost-benefit analysis of Alternative 2D. From my  
16 understanding, its effectiveness is still  
17 uncertain, so under CERCLA Section 121(b)(1)(f), I  
18 suggest that EPA consider the worst-case scenario  
19 if the proposed plan were to fail. Therefore, it  
20 would give us a true cost-benefit analysis of  
21 comparing Alternative 2D to all other alternatives.

22 My second concern is with the three  
23 residential houses with a retirement property that  
24 borders the landfill site. And from the

1 feasibility study, I noticed that they have PCB  
2 contaminants but it is under four feet of  
3 clean-filled material. I just suggest EPA consider  
4 under CERCLA Section 101, for remedy of remedial  
5 action, to see if it's cost effective or  
6 environmentally preferable to relocate those three  
7 residential areas and the retirement home;  
8 therefore, long-term effects of the monitoring and  
9 keeping track of how much PCB might be released and  
10 what's happening to those three residences can be  
11 kind of controlled.

12 My third concern deals with MEPA, the  
13 Michigan Environmental Protection Act, which is a  
14 lot more substantive than NEPA, and under the four  
15 factors from the case, City of Portage versus  
16 Kalamazoo County Road Commission, the first factor  
17 deals with natural resources that are rare and  
18 unique, or endangered, or have historical  
19 significance. I would just like the EPA to  
20 consider if the Portage Creek falls under one of  
21 those categories, and if so, does Alternative 2D in  
22 its entirety do the best job of preserving and  
23 conserving Portage Creek as a natural resource. Or  
24 should the EPA consider Alternative 2D with a

1 subalternative such as (i), which would also have  
2 trenches and a well that would at least help  
3 protect the Creek.

4 My fourth concern deals with a little bit  
5 of clarifying the feasibility study addendum and  
6 the proposed plan. And in the proposed plan I  
7 noted that the -- with Alternative 2D there will be  
8 a lot of restrictive covenants to limit residential  
9 use, but from what I've seen under the feasibility  
10 study addendum with Alternative 2D, one possible  
11 use of the proposed plan is to have a recreational  
12 zone, which could include playgrounds. I just  
13 urge the EPA to consider how playgrounds would be  
14 working out with little children and the  
15 restrictive covenants of either using the fences or  
16 having more institutional controls of signage so  
17 therefore the kids know not to go by the Creek and  
18 drink some water, or stay away from that little  
19 pipe that is coming out of the ground. And those  
20 are my four concerns and thank you so much.

21 MS. RUSSELL: I had 12 turned in and  
22 there is no name. Anybody want to take ownership  
23 of that? Okay, Kris Mbah.

24 MR. MBAH: Good try. Mbah. And so I

1 believe this comment period only is a formality  
2 because you've already made your decisions, and so  
3 I'm wondering how do you actually include people in  
4 this communication process? I'm looking around and  
5 I'm looking at everyone here and it's a pretty  
6 homogeneous group and, of course, this Allied Site  
7 is relatively surrounded with Hispanic community  
8 and more minorities. How are you reaching out to  
9 these minorities and whom are you working with  
10 within our community that actually has  
11 relationships with these minorities and core  
12 communities in order to actually bring them to this  
13 table that, of course, you've already made the  
14 decisions? So I'm wondering, how do you actually  
15 reach out to the community here? Thank you.

16 MS. RUSSELL: Thank you. Next I have  
17 Chris Wahmhoff.

18 MR. WAHMHOFF: My name is Chris Wahmhoff.  
19 I live at the end of the street at Bryant, 1407. I  
20 was born in Plainwell, Michigan. Actually, my  
21 childhood fort used to be on the Superfund Site in  
22 Kalamazoo. And they brought the PCBs up here; that  
23 was a basketball court that I played as a kid. I  
24 can tell you that whole process, we never got any

1 of these warnings. Kids were fishing out of the  
2 river then when they were cleaning up, they didn't  
3 say anything. We were playing basketball and they  
4 didn't say anything then.

5 And I moved up here -- I actually used to  
6 live right next to the Outriders Bike Club. I woke  
7 up and lived in that spot for a year. I didn't  
8 hear a word about this being a Superfund site. I  
9 didn't hear about it being a problem being safety.  
10 I didn't hear anything about it the whole time I  
11 lived there. Now I live here on Bryant and this  
12 doesn't go away. But we've worked with some stuff  
13 from the oil spill that we've already had in this  
14 river. I've worked with the EPA there and I'll  
15 give you guys credit; it wasn't you two.

16 At EPA, and if anybody wants to YouTube  
17 Ward Creek, it was on June 17th, 2013, we found a  
18 company illegally dumping. We told EPA, Region 5,  
19 and nothing ever happened. 2012, EPA and MDEQ said  
20 that the Kalamazoo River was safe for people to go  
21 and swim in. What they didn't bother to tell  
22 anybody, if you want to look up, -- and feel free  
23 to go and prove me wrong -- they said they based  
24 some of the data to say that it's safe for people



1 on a theoretical basis that the same health effects  
2 for animals would be the same for people.

3 So I know that I have some of the  
4 paperwork on that for me, but I hear a lot of  
5 people thanking the EPA. I hear a lot of people  
6 saying how considerate they are. You guys think --  
7 I want to know, do you think that they're going to  
8 keep your kids safe? Do you really think that this  
9 is about our safety and not about money?

10 Well, here's another one: This one I did  
11 bring a flyer on. We all know what's happening in  
12 Flint. Well, here's some of the documentation that  
13 the EPA knew about this since 2004. So when they  
14 say they're about our safety, I won't take it and  
15 I'm turning my back purposely on them and I don't  
16 care if they can hear me or not. I'm saying this  
17 to all of you. It is our responsibility to not ask  
18 them, to make them do it. I don't know if anybody  
19 else saw that up there but community is ranked No.  
20 9 on the nine people of importance that this is  
21 about.

22 Now I know that BioPath Solutions also  
23 reached out to them and they didn't do it. They're  
24 going to give them the runaround, the bench test;

1 that's why they're pushing for this. It is our  
2 responsibility to stand up for ourselves. It is  
3 our responsibility to stand up for ourselves. Does  
4 anybody believe this state government or this  
5 federal government is really speaking for us? Do  
6 any of the community members believe any of that?  
7 It's on us.

8 MS. RUSSELL: Next is to Wayne Hampton.

9 MR. HAMPTON: I'm Wayne Hampton and I've  
10 been around these meetings for quite a while. I  
11 want to commend the current leadership of EPA  
12 Region 5 and those in the City of Kalamazoo for  
13 working together to make progress away from the  
14 earlier combative relationship that was essentially  
15 getting nothing done, nothing moved, everything was  
16 stagnant. It looks like we are poised on the  
17 precipice of actually doing something. So far, if  
18 you look at all the PCB amassed in the Kalamazoo  
19 Superfund area of concern, I think somewhere around  
20 1.5 to 2% has been removed or dealt with.

21 But clearly we need to move forward. I  
22 think this suggested decision is the best possible  
23 outcome of the process. I know Mayor Hopewell  
24 wants to see some of this beautiful riverside

1 property returned to productive use. I know the  
2 community wants to see the barbed-wire or  
3 chain-link fence come down and I, myself, would  
4 like the chance someday to walk or jog or even bike  
5 along Portage Creek; it's actually quite nice  
6 looking. So it would be nice to see this return to  
7 some kind of beneficial use that would augment the  
8 value that we have here in the City of Kalamazoo.

9 Last but not least, I think that the  
10 community has been listened to. I've attended a  
11 lot of meetings and I haven't gone to every one of  
12 them. There was one not that long ago over in the  
13 Hispanic Center next to St. Joseph Church. There  
14 have been efforts to reach out, they've even  
15 offered cookies. So I want to commend those who  
16 have tried to make this a community outreach. I  
17 think they've been listening and, again, I think  
18 this is probably the best deal we're going to get.

19 MS. RUSSELL: Thank you. Next we have  
20 Matt Fletcher.

21 MR. FLETCHER: My name is Matt Fletcher.  
22 I've been -- I think this is a unique partnership  
23 between the city and the EPA. I think it's a --  
24 it's never been done before. The EPA, you know,

1 God knows it's not perfect, but there's places, I  
2 don't know, 500 -- 1000 miles south of here and  
3 they just like had to do without any environmental  
4 regulations. And so I'm excited about this because  
5 this is a different process that the EPA -- instead  
6 of just having a community and saying this is the  
7 way it's going to be. I know Marc Hatton and Bruce  
8 Merchant and many of the other city leaders who  
9 spent, you know, hundreds of hours with the EPA,  
10 and like I said, I think this is a really unique  
11 opportunity.

12 I'm concerned about moving 110,000 dump  
13 trucks full of PCBs through the neighborhoods over  
14 three or five years. I live -- you know, I own  
15 property on West Maple Street and Emerson, which is  
16 just a quarter-of-a-mile away from here, and I can  
17 only imagine, you know, a part of that -- you know,  
18 this neighborhood and not Edison; it's just a  
19 rock's throw over there to the south side  
20 neighborhood.

21 But I'd like to give this to the -- a  
22 chance. Regarding BioPath, I had an opportunity to  
23 listen to -- about an hour and 45 minutes, I'm a  
24 member of the East -- EEC with Chris, and listened

1 to them and it's a really exciting technology.  
2 When -- one of the questions that was asked last  
3 night, I just said how -- what is the largest PCB  
4 site you've done before and it was in California;  
5 it was 30,000 cubic yards. And we have 1.6  
6 millions cubic yards.

7 I really hope -- I'm cheering for BioPath  
8 down the line, but I don't know if right now if the  
9 timing is right. I don't see any reason why this  
10 couldn't be re-examined by the city or the EPA in  
11 five years. If there was a technology that proved  
12 -- proves to work -- because there hasn't been any  
13 academic studies yet. I know that they have  
14 independent studies but there hasn't been any  
15 academic studies; it's a relatively new technology.

16 And so this might be the way to go five  
17 or ten years from now, but I think right now the 2D  
18 compromise -- that's what I'm really excited about,  
19 because I think that's what I'm excited about. So  
20 that's it, thank you.

21 MS. RUSSELL: Thank you. Next is Dayle  
22 Harrison.

23 MR. HARRISON: Mr. Berkoff, I want to  
24 thank you for hosting the meeting today and the

1 EPA. My name is Dayle Harrison and I'm president  
2 of the Kalamazoo River Protection Association.  
3 Back in 1978, myself and about four other board  
4 members of the Kalamazoo River Protection  
5 Association met at the Allied Paper Site with the  
6 media trying to get them to approach and get that  
7 Portage Creek Site cleaned up.

8 I recognize it's a long time ago, some of  
9 you folks weren't even born then, but a few of you  
10 were probably there. And I want to give you a  
11 little history of what's happened since then, not  
12 enough. Way not enough. Fortunately in the  
13 mid-1990s, about 1998, '97 there was a  
14 time-critical removal action on Portage Creek.  
15 That has been the most upstream, highest level of  
16 PCB contamination found throughout the Superfund  
17 site.

18 And after several years and about  
19 \$25,000,000, that site was pretty much cleaned up;  
20 it was stabilized and at that time there was only a  
21 very small, almost not even detectable level of  
22 PCBs entering Portage Creek and downstream from the  
23 Kalamazoo River. There were still issues with  
24 Portage Creek, but the Allied site was pretty much

1 safe and environmentally protected.

2 One of the issues here certainly close to  
3 my heart, is the issue of aesthetics versus  
4 environmental protection. I wrote to Mr. Berkoff  
5 back in 2010 saying that I've reviewed then the  
6 feasibility study that looked at an Alternative 2B,  
7 which was a consolidation of materials at the  
8 existing facility.

9 My thought was there was strong agreement  
10 with any data for that, there was environmental  
11 protection, protective of human health and the  
12 environment. It was cost effective back then; it  
13 was called 2B. Back then it was \$41,000,000, now  
14 today it's \$43,000,000. So it's my firm belief  
15 that action is to protect human health and  
16 environment at the site and I'm not sure that EPA  
17 concurs with that.

18 Further evidence is, is that in the  
19 bankruptcy proceedings, EPA estimated and gave  
20 themselves room to negotiate how much it would cost  
21 them to remediate the Allied Paper Site. They came  
22 up with a figure of \$53,000,000, which was more  
23 than they knew that they thought would be necessary  
24 at the time to provide a certain safeguard. And

1 that produced documents from the Department of  
2 Justice, the bankruptcy courts ordered. So that  
3 left pretty much a safe amount dedicated to lower  
4 Kalamazoo River.

5 It was my understanding, and I think it's  
6 still true today, that if they don't spend the  
7 \$53,000,000 at the Allied Paper Site, that money  
8 will be used to go downstream for remediation. Now  
9 everyone in this room I think should know by now  
10 that the health risk to fish and wildlife, we all  
11 know, are downstream. So what we're looking at is,  
12 will EPA compromise its position, which it's held  
13 firmly for so long and stay with the 2B plan, or  
14 will they go with something that's more  
15 aesthetically pleasing to the community. This  
16 should have been done a long time ago. This could  
17 have been done in 2005 or even 2010, but it hasn't  
18 happened yet today.

19 So let's get back to this issue of money.  
20 There isn't a lot of money for the Kalamazoo River  
21 but we have a vested interest in that bankruptcy  
22 money just like the people in Allegan County.  
23 We're third-party beneficiaries, we are entitled to  
24 benefit from the bargaining the EPA made. We're



1 also entitled to have a sound solution to the  
2 Allied facilities, so if we can do it with  
3 \$43,00,000 or less, then why would we want to waste  
4 \$20,000,000 to satisfy a condition that is an  
5 environmental risk.

6 Whenever the EPA steps out of bounds and  
7 gets into its political arena, we endanger future  
8 cleanups downstream, not just the Kalamazoo River  
9 but in sites throughout the country. There isn't  
10 anyone here when they don't look inside and look in  
11 the mirror and look inside of them politically in  
12 the last seven years or so and this is exactly  
13 what's transpired.

14 We had a solution, EPA bowed to the  
15 community, which I think is a good idea, but if  
16 it's just added studies and producing more  
17 projects, and it doesn't improve the environmental  
18 protection or human health protection and that's  
19 not your job, that's somebody else's job. Your job  
20 is to look at CERCLA and provide environmental  
21 protection, which you've done.

22 You've made that decision a couple of  
23 times five years ago or more and here we are today  
24 in a brand-new ballgame. How are we going to deal

1 with this, because they are going to look at  
2 \$20,000,000, which is money to be used for  
3 downstream efforts and I would be really shocked if  
4 they --

5 MS. RUSSELL: You're at five minutes.

6 MR. HARRISON: I have five minutes left?

7 MS. RUSSELL: No, you've had five  
8 minutes.

9 MR. HARRISON: Well, I appreciate your  
10 position. You know, I've represented our group  
11 that's been on this site for almost four decades  
12 now. We've been intimately involved with the  
13 issues in all the fronts. We've been to thousands  
14 of meetings over that 40-year period. So I  
15 encourage the EPA to discard the preferred  
16 alternative and go back to the 2B alternative,  
17 which is more than adequate to protect the  
18 environment and public health and I'll be  
19 forwarding other comments before the deadline.  
20 Thank you very much.

21 MS. RUSSELL: George Magas.

22 MR. MAGAS: Hello, I'm George Magas.  
23 Well, if we only have a certain amount of money and  
24 if you're taking that money and spending it

1 downstream, it's kind of like it's earmarked for us  
2 and when you write a check for a non-profit and you  
3 say you want it used for a certain item, they can  
4 go back at you if you don't use it for the item  
5 that you address it for. So we've lost that money  
6 to use at this site, you know what I'm saying? So  
7 it needs to go there.

8 And the other thing is, you probably  
9 based a lot of your trucking this off to another  
10 site on oil prices of three and 50 a gallon and now  
11 it's under \$2.00 a gallon, so if you rework those  
12 numbers that price is going to come down, so we  
13 could possibly remove the PCBs offsite.

14 MS. RUSSELL: Thank you.

15 MR. BERKOFF: Thank you.

16 MS. RUSSELL: I'm out of cards here.

17 That's not precluding someone from grabbing one if  
18 they so desired. I don't see anyone moving in that  
19 direction, so I'm just going to go ahead and close  
20 this portion of the comment period. Please note  
21 that you can submit your comments, postmark those,  
22 mail them, submit them online. Those need to be  
23 postmarked by December 1, submitted by December 1,  
24 and those will be submitted into the public

1 comments for this remedy. So with that, on behalf  
2 of Region 5 EPA, thank you all for coming out and  
3 spending your time with us this evening. We value  
4 that time and effort you made to come out and talk  
5 about this project. And have a good evening and  
6 travel home safely. Thank you.

7 (The hearing is concluded at 8:15 p.m.)  
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CERTIFICATE

STATE OF MICHIGAN

COUNTY OF BERRIEN

I, KRISTI AUBREY, a Certified Stenomask  
Reporter and Notary Public in and for the State of  
Michigan, do hereby certify that the foregoing  
transcript taken on November 19, 2015, is true and  
accurate to the best of my knowledge, skill, and  
ability.

IN WITNESS WHEREOF, I have hereunto set my  
hand this 15th day of December, 2015.

SUBSCRIBED AND SWORN TO  
before me this 15 day  
of December, A.D., 2015.

*Mary B. Cuyler*  


NOTARY PUBLIC

*Kristi Aubrey*

KRISTI AUBREY, CSMR-9019

My commission expires:

May 20, 2022

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